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BY MESSENGER

Bruce P. Beausejour, Esq.
Verizon
185 Franklin Street, Room 1800
Boston, MA 02110

**Re: D.T.E. Docket No. 01-20 –
Incomplete Discovery Responses by Verizon – Fourth Letter**

Dear Bruce:

I was troubled this afternoon when I saw Verizon's response to ATT-VZ 27-2, and learned that Verizon is just now starting to look for guidelines regarding interoffice facilities, which are documents that we first requested on or about May 8, 2001. We should have received this documentation months ago. Verizon had repeatedly denied that such documents ever existed, but those denials cannot be squared with today's surprising discovery response.

Our discovery request ATT-VZ 2-41 read as follows:

"Please provide a copy of all planning documents, engineering guidelines, manufacturers' specifications and the like that Verizon uses in planning and engineering its interoffice fiber ring network."

Verizon responded on May 29, by claiming that "Verizon MA does not use engineering guidelines for planning and engineering its interoffice fiber ring network." Verizon also refused to produce relevant manufacturers' specifications that it has in its possession.

The assertion that Verizon has no engineering guidelines concerning its interoffice fiber ring network came as a surprise, since Verizon generally has guidelines or even detailed methods and procedures that it uses to manage its operations. I therefore wrote to you on July 3, and said the following:

"It is difficult to believe that Verizon has no documents giving its engineers information regarding how to lay out interoffice facilities. Please provide a supplemental response that either confirms that no planning documents of any kind regarding interoffice facilities exist, or that provides copies of the planning documents that do exist."

Bruce P. Beausejour
August 15, 2001
Page 2

In response, on July 12 Verizon filed a supplemental answer to ATT-VZ 2-41, which read as follows:

“Verizon MA confirms that it has no engineering/planning documents or engineering guidelines used in planning and engineering its interoffice fiber ring network.”

Today, almost three months after the documents we requested should have been provided by Verizon, we learned that these prior assertions by Verizon were not correct. Verizon today filed its response to ATT-VZ 27-2, in which Verizon finally conceded the following (emphasis added):

“In 1992-1994, **Mr. Gansert** was the Managing Director of Network Transition Planning for NYNEX. His organization provided recommendations for deploying new technologies such as SONET in all NYNEX states including Massachusetts. **In 1994-1996**, he was Managing Director Network and OSS Architecture Planning for NYNEX. One of this organization[']s **responsibilities** was **to provide all Engineering Applications Guidelines for the use of SONET technology throughout NYNEX telcos**.

“**Mr. Gansert’s organization** did not conduct detailed engineering on specific network projects but rather **supplied guidelines** and direction **for such projects**. **The organization produced a large volume of such documents relative to SONET deployment**. Most of these will be difficult or impossible to locate at this time. A search is being conducted of old document libraries. Any documents discovered that are responsive to this request will be provided in a supplemental response.”

Verizon should have been able to identify this fact, and begin looking for these responsive documents, back in May. Mr. Gansert was a witness for Verizon in the recent New York UNE proceedings (just as he was in Massachusetts in 1996), and Verizon should have known that he might be a witness on similar topics in this proceeding. Given Mr. Gansert’s role as a witness and his purported background, it is inexplicable that Verizon did not ask him whether the company has any guidelines regarding interoffice fiber rings.

We are entitled to this documentation, as well as to any more recent documentation that updates or supercedes the guidelines regarding interoffice fiber rings prepared and distributed within NYNEX by Mr. Gansert’s organization in the mid-1990s. We are also entitled to any more recent documentation that has otherwise been used to provide guidance within Verizon regarding the planning and engineering of such interoffice facilities. We need to review these documents as we prepare to respond to Mr. Gansert’s rebuttal testimony. We should have received the documents in late May or early June. Instead, we are told on August 15 that Verizon is just starting to look for them.

Bruce P. Beausejour
August 15, 2001
Page 3

Would you please let me know when Verizon will finally produce this documentation?
Thank you.

Very truly yours,

Kenneth W. Salinger

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